

## Japanese Carbon and Alloy Flat Products Exclusion Request

**Product Category:** Plate (#2)

(a)	Product Designation/HTS	<b><u>High-Carbon Hot-Rolled Alloy Steel Plate</u></b> 7225.30.70.00, 7225.40.70.00, 7225.40.30.50, 7225.50.85.00, 7226.91.70.00
(b)	Product Description	High-carbon hot-rolled alloy steel is made to specifications SAE 8670 modified, SAE 4130, SAE 4135 (modified), SAE 8660, SAE4130 (modified) JIS SCM 435.
(c)	Basis for Exclusion	See text below
(d)	Names and Location of U.S. and Foreign Producers	See Attachment A
(e)	U.S. Consumption	See Attachment B
(f)	U.S. Production	See Attachment B
(g)	Substitutable Products	See Attachment C

**Attorney Contact:** Matthew R. Nicely (202-429-4705, mnicely@willkie.com) or  
Julia K. Eppard (202-429-4709, jeppard@willkie.com)  
**Willkie Farr & Gallagher**

Certain high-carbon, hot-rolled, alloy steel is produced for use in saw blades for cutting wood, metal, concrete, and stone. This hot-rolled product is purchased as sheet or plate, depending on the end users' or the processors' requirements. We incorporate by reference here arguments submitted in **Exhibit 4** concerning certain hot-rolled steel products, that included a request to exclude high-carbon, hot-rolled, alloy steel from this investigation.

Imported high-carbon plate is typically more expensive than U.S. plate. As shown in **Attachment B**, the unit price for certain high-carbon, hot-rolled alloy steel plate from Japan ranged from [ ] during the period of investigation. Compare these prices to the pricing data collected by the Commission for the selected pricing products which are intended to be representative of U.S. prices of hot-rolled steel products in general.<sup>1</sup> This attachment demonstrated the significant overselling of these specialty products imported from Japan. Imports of high-priced specialized products have no detrimental effect on the domestic industry and warrant exclusion from any 201 remedy.

To place restrictions on imports would unfairly harm domestic consumers of this specialized hot-rolled alloy steel plate product without benefiting the domestic producers who have been unable to unwilling to provide a product. Moreover, the available pricing data indicates that the [ ] overselling by imports demonstrates that Japan is not contributing to

<sup>1</sup> See ITC's Staff Report at Table FLAT-67 (public version).

the serious injury of the domestic injury. Therefore it is appropriate to exclude high-carbon, hot-rolled, alloy steel plate from any 201 remedy.

**Attachment A**

**Foreign Producers**

(1) NKK Corporation

- Address: 1-1-2, Marunouchi Chiyoda-ku, Tokyo 100, Japan
- Phone: 011-81-3-3217-2444
- Fax: 011-81-3-3214-8417

(2) Kawasaki Steel Corporation

- Address: Hibiya Kokusai Bldg., 2-3, Uchisaiwai-cho 2-chome, Chiyoda-ku, Tokyo 100-0011, Japan
- Phone: 011-81-3-3597-4019
- Fax: 011-81-3-3597-3749

**Domestic Producers**

(1) WCI Steel Inc., Warren, OH

## PLATE

**High-Carbon Hot-Rolled Alloy Steel Plate**

<b>Quantity</b>						<b>January - June</b>		<b>Projections</b>				
<b>Company</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>YTD 2000</b>	<b>YTD 2001</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>
[	0	0	1,204	1,186	1,237	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	1,204	1,186	1,237	0	0	0	0	0	0	0
]												
<b>Value *</b>						<b>January - June</b>		<b>Projections</b>				
<b>Company</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>YTD 2000</b>	<b>YTD 2001</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>
[	91,868	513,254	906,693	779,157	905,205	397,256	279,192	397,699	374,991	374,991	397,699	374,991
	0	0	0	0	0	0	0	0	0	0	0	0
Total	91,868	513,254	906,693	779,157	905,205	397,256	279,192	397,699	374,991	374,991	397,699	374,991
]												
<b>[Unit Price</b>	0	0	0	0	0	0	0	]				
<b>U.S. Production</b>	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown
<b>Imports from Other</b>	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown
<b>Countries</b>	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown
<b>Total U.S.</b>	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown
<b>Consumption</b>	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown	unknown

**Attachment C**

Known Substitutable Products: None

U.S. Production: None

U.S. Producers: None